

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

VS.

OLASUNKANMI KAZEEN SHITTU

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Case Number:

11

481

United States Courts
Southern District of Texas
FILED

JUN 29 2011

David J. Bradley, Clerk of Court

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1
(Conspiracy)

A. THE CONSPIRACY AND ITS OBJECTS

1. From in or about July 2010 and continuing at least until on or about June 1, 2011, in the Houston Division of the Southern District of Texas, the defendant,

OLASUNKANMI KAZEEN SHITTU

did knowingly combine, conspire, confederate and agree with others known and unknown to the Grand Jury to defraud federally insured financial institutions in violation of 18 U.S.C. § 1344.

B. THE MANNER AND MEANS OF THE CONSPIRACY

It was a part of the conspiracy that:

2. The defendant and one or more conspirators would and did obtain the personal information of third party victims,

3. The defendant and one or more conspirators would and did open credit card accounts at various banks, including First National Bank of Omaha, Bank of America, and HSBC Bank in the name of the third party victims who had no knowledge of the scheme,

4. The defendant and one or more conspirators would and did intercept credit cards mailed to the unaware victims at their home addresses, and

5. The defendant and one or more conspirators would and did use the credit cards to make purchases and ATM cash withdrawals for their own personal benefit.

C. OVERT ACTS

6. In furtherance of the conspiracy, and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Houston Division of the Southern District of Texas,

(a) On April 28, 2011, a conspirator completed an online application with HSBC Bank using the personal information of a victim with the initials A.M., resulting in the issuance of HSBC MasterCard No. xxxx-7864,

(b) On May 2, 2011, a conspirator completed an online application with

Bank of America using the personal information of a victim with the initials N.D., resulting in the issuance of Bank of America Visa Card No. xxxx-6268, and

(c) On May 10, 2011, OLASUNKANMI KAZEEN SHITTU used HSBC MasterCard No. xxxx-7864 to purchase \$954.77 worth of items at a Dillard's department store in Houston,

(d) On May 17, 2011, a conspirator completed an online application with First National Bank of Omaha using the personal information of a victim with the initials B.W., resulting in the issuance of First National Bank of Omaha Visa card No. xxxx-0114,

(e) On May 27, 2011, OLASUNKANMI KAZEEN SHITTU used First National Bank of Omaha Visa Card No. xxxx-0114 to purchase \$1334.20 worth of items at a Dillard's department store in Houston, and

(f) On May 28, 2011, OLASUNKANMI KAZEEN SHITTU used Bank of America Visa Card No. xxxx-6268 to purchase \$513.11 worth of items at a Dillard's department store in Houston.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-4
(Bank Fraud)

A. INTRODUCTION

At all times material to this indictment:

1. The Federal Deposit Insurance Corporation (FDIC) was an agency of the federal government which insured the deposits of member banks against loss up to \$250,000 with the purpose of preventing their collapse and instilling public confidence in the nation's banking institutions.

2. First National Bank of Omaha, Bank of America, and HSBC Bank were all financial institutions the deposits of which were insured by the FDIC.

B. THE SCHEME AND ARTIFICE

3. From in or about July, 2010 and continuing at least until on or about June 1, 2011, in the Houston Division of the Southern District of Texas and elsewhere,

OLASUNKANMI KAZEEN SHITTU

did knowingly execute and attempt to execute a scheme and artifice to defraud various banks, all financial institutions affected by the scheme, the accounts of which were insured by the FDIC, and to obtain moneys, funds and other property owned by and under the custody and control of the various financial institutions, by means of false and fraudulent pretenses, representations and promises as further set forth in the counts below.

C. THE METHOD AND MEANS OF THE SCHEME AND ARTIFICE

4. Among the deceitful and dishonest means by which the defendant sought to accomplish and did accomplish the purpose of the scheme to defraud were the acts set forth in paragraph 2 through 5 of the manner and means contained in Count One of the Indictment, hereby re-alleged and incorporated as if fully set forth in these Counts of the Indictment.

D. EXECUTION OF THE SCHEME AND ARTIFICE

5. On or about the following dates,

OLASUNKANMI KAZEEN SHITTU

executed and attempted to execute the aforesaid described scheme and artifice to defraud by using credit cards to make retail purchases at a Dillard's department store in Houston, Texas, as described in the counts below:

COUNT	DATE	AMOUNT OF PURCHASE	BANK AND CREDIT CARD NUMBER.	IDENTITY ON ACCOUNT
2	5/10/11	\$954.77	HSBC Bank # xxxx-7864	A.M.
3	5/28/11	\$513.11	Bank of America # xxxx-6268	N.D.
4	5/27/11	\$1334.20	First National Bank of Omaha # xxxx-0114	B.W.

In violation of Title 18, United States Code, Section 1344 and 2.

COUNT 5

(Aggravated Identity Theft)

From in or about July 2010, and continuing at least until on or about June 1, 2011, in the Houston Division of the Southern District of Texas, the defendant,

OLASUNKANMI KAZEEN SHITTU

did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, to-wit, the name, social security number, and date of birth of a third party victim with the initials "A.M." during and in relation to a violation of Title 18, United States Code, Section 1344 (Bank Fraud).

All in violation of Title 18, United States Code, Sections 1028A.

COUNT 6

(Aggravated Identity Theft)

From in or about July 2010, and continuing at least until on or about June 1, 2011, in the Houston Division of the Southern District of Texas, the defendant,

OLASUNKANMI KAZEEN SHITTU

did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, to-wit, the name, social security number, and date of birth of a third party victim with the initials "N.D." during and in relation to a violation of Title 18, United States Code, Section 1344 (Bank Fraud).

All in violation of Title 18, United States Code, Sections 1028A.

COUNT 7
(Aggravated Identity Theft)

From in or about July 2010, and continuing at least until on or about June 1, 2011, in the Houston Division of the Southern District of Texas, the defendant,

OLASUNKANMI KAZEEN SHITTU

did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, to-wit, the name, social security number, and date of birth of a third party victim with the initials "B.W." during and in relation to a violation of Title 18, United States Code, Section 1344 (Bank Fraud).

All in violation of Title 18, United States Code, Sections 1028A.

ORIGINAL SIGNATURE ON FILE

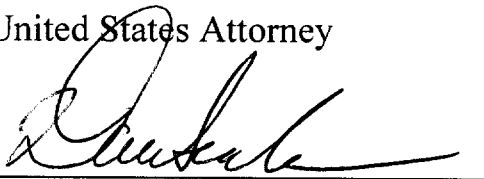
TRUE BILL /

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

JOSE ANGEL MORENO
United States Attorney

By:



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